

**MARSHALL DENNEHEY  
WARNER COLEMAN & GOGGIN**

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February 12, 2013

Shanni Snyder  
P.O. Box 96  
East McKeesport, PA 15035

Shanni Snyder, pro se  
2009 Luehm Avenue  
North Versailles, PA 15137

**Re: Shanni Snyder, et al v. Michael Daugherty, et al**  
**In the United States District Court for the Western District of Pennsylvania**  
**Civil Division; No: 11-0879**  
**Our File No: 04048.191**

Dear Ms. Snyder:

Pursuant to Order of Court, you were to notice any depositions to be taken in this case no later than Friday, April 1, 2013. I received a document from you entitled "Notices of Deposition" on February 6, 2013. Even allowing three days for mail, your notice was received grossly out of time.

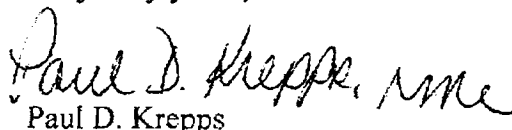
More importantly, your purported Notice of Deposition is fatally flawed and therefore, will not be honored.

A Notice of Deposition necessarily requires a statement that it will be taken in front of an individual who is "an officer authorized to administer oath either by federal law or by the law in the place of the examination." See FRCP 28(a)(1)(A). Your Notice of Deposition does not include this information. Rather, it appears as though you intend to take the depositions of these officers by setting up a video recorder. Furthermore, your Notice of Deposition indicates that "the taking of this deposition may be adjourned from day to day until completed, and may occur over several days." The federal rules limit you to 7 hours per deposition. Therefore, no deposition will "occur over several days."

In that your purported Notice of Deposition is fatally flawed, you should proceed with the understanding that none of the officers will appear as you purportedly direct. You are on sufficient notice that if you disagree, once you have the opportunity to review Rules 28, 29 and 30, then I suggest you immediately file an appropriate motion with the court. The Defendants are under no obligation to obtain a protective order from the court because your Notice of Deposition is not a valid discovery notice or request.

Feel free to call me should you have any questions.

Very truly yours,

  
Paul D. Krepps

PENNSYLVANIA	DELAWARE
Bethlehem	Wilmington
Doylestown	
Erie	OHIO
Harrisburg	Cleveland
King of Prussia	FLORIDA
Philadelphia	Ft. Lauderdale
Pittsburgh	Jacksonville
Scranton	Orlando
	Tampa
NEW JERSEY	NEW YORK
Cherry Hill	Long Island
Roseland	New York City

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SHANNI SNYDER,	) No. 11 civ 879
	)
Plaintiff,	)
	)
v.	)
	)
MICHAEL DAUGHERTY, et al,	)
	)
Defendants.	)

NOTICES OF DEPOSITION

To the Defendants:

**PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff hereby notices the following depositions. These depositions may be videotaped and Plaintiff provides notice to Defendants and the other parties to this action that the deposition may be used at the time of trial. The taking of this deposition may be adjourned from day to day until completed, and may occur over several days.

The deposition shall take place at the following location, subject to change on notice at least 10 days before the deposition: 2009 Leuhm Avenue, North Versailles, PA 15137.

Michael Daugherty  
March 18, 2013  
10:15 a.m.

David Bertok  
March 19, 2013  
10:15 a.m.

Robert Rizzo  
March 20, 2013  
10:15 a.m.

James Novak  
March 21, 2013  
10:15 a.m.

Gregory Arendas  
March 22, 2013  
10:15 a.m.

Robert Dippolito  
March 25, 2013  
10:15 a.m.

Nicholas Dreistadt  
March 26, 2013  
10:15 a.m.

William Sombo  
March 27, 2013  
10:15 a.m.

Carl Steinkopf  
March 28, 2013  
10:15 a.m.

William Kauffman  
March 29, 2013  
10:15 a.m.

Jeffrey Bouldin  
April 1, 2013  
10:15 a.m.

William Bouldin  
April 2, 2013  
10:15 a.m.

Plaintiff will accommodate reasonable rescheduling/changes to the order of the depositions based on Defendants' employment needs.

Respectfully submitted,

/s/ Shanni Snyder

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Shanni Snyder  
PO Box 96  
East McKeesport PA 15035  
(412) 758-1371  
s.snyder@box96.net

PLAINTIFF

CERTIFICATE OF SERVICE

I, Shanni Snyder, affixed postage prepaid, First Class mail, and deposited this Notices of Deposition into the United States Mail on February 1, 2013, addressed to Paul D. Krepps, Esquire; Marshall Dennehey Warner Coleman & Goggin.

/s/ Shanni Snyder

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Shanni Snyder